

# SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR  
3000 K STREET, NW, SUITE 300  
WASHINGTON, DC 20007-5116  
TELEPHONE (202) 424-7500  
FACSIMILE (202) 424-7643  
WWW.SWIDLAW.COM

Eliot J. Greenwald  
Direct Dial: (202) 424-7809  
Fax: (202) 424-7643  
EJGreenwald@swidlaw.com

NEW YORK OFFICE  
THE CHRYSLER BUILDING  
405 LEXINGTON AVENUE  
NEW YORK, NY 10174  
TEL. (212) 973-0111  
FAX (212) 891-9598

October 22, 2002

## **BY ELECTRONIC COMMENT FILING SYSTEM**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Final Report of IT&E Overseas, Inc. for Stations KNLF923  
and KNLG849 on Implementation of TTY Digital  
Compatibility for 911 Emergency Calling  
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of IT&E Overseas, Inc. ("IT&E"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit its final report and request for waiver on implementation of TTY digital compatibility for 911 emergency calling for Stations KNLF923 and KNLG849.<sup>1</sup>

### **Development Activities**

#### **(1) Network infrastructure software development**

IT&E currently uses Lucent Technologies ("Lucent") as the infrastructure provider for its CDMA system. Lucent has developed the software feature required for TTY digital compatibility.

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<sup>1</sup> On July 12, 2002, IT&E requested a waiver of the implementation deadline for TTY digital compatibility for 911 emergency calling. The Commission has not yet acted on the waiver request.

**(2) Handset development and testing plans**

IT&E has obtained handsets with TTY digital compatibility.

**(3) Beta testing and lab testing**

The manufacturers are responsible for beta testing and lab testing.

**(4) Release and general availability to carriers of network infrastructure software**

Lucent has developed the software feature required for TTY digital compatibility.

**(5) Availability to carriers of full acceptance test units**

IT&E has obtained full acceptance test units.

**(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices**

Lucent has installed the software feature required for TTY digital compatibility.

**Testing and Deployment Activities****(7) Carrier coordination of testing with PSAP**

IT&E has successfully tested TTY digital compatibility with the PSAPs.

**(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests**

Successful testing of the software feature required for TTY digital compatibility has taken place.

**(9) Retail availability of necessary consumer equipment**

IT&E will make available handsets with TTY digital compatibility upon request.

**(10) Geographic scope of network infrastructure deployment**

TTY digital compatibility has been deployed throughout all parts of the Guam and Northern Mariana Islands BTAs where IT&E is capable of providing commercial mobile radio service to customers.

Respectfully submitted,

/s/

Eliot J. Greenwald

Cc: Qualex International (by e-mail)  
Pam Gregory (by e-mail)  
Mindy Littell (by e-mail)  
Barry Ohlson (by e-mail)